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*Co-Counsel to the Ad Hoc Committee of
Governmental and Other Contingent
Litigation Claimants*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
In re : Chapter 11
:
PURDUE PHARMA L.P., *et al.*, : Case No. 19-23649 (RDD)
:
Debtors¹. : (Jointly Administered)
----- X

**THIRD MONTHLY FEE STATEMENT OF OTTERBOURG P.C.
FOR ALLOWANCE OF COMPENSATION FOR SERVICES
RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED
AS CO-COUNSEL OF THE AD HOC COMMITTEE'S PROFESSIONALS FOR THE
PERIOD OF DECEMBER 1, 2019 THROUGH AND INCLUDING DECEMBER 31, 2019**

Name of Applicant:	Otterbourg P.C.
Applicant's Role in Case:	Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants
Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:	December 2, 2019, [dkt. no. 553]

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Period for Which Compensation is Sought:	December 1, 2019 – December 31, 2019
Total Amount of Fees Incurred:	\$82,248.00
Total Fees Requested (80%):	\$65,798.40
Total Reimbursement of Expenses Incurred:	\$240.92
Total Reimbursement of Expenses Requested (100%):	\$240.92
Total compensation and Reimbursement Requested in this Statement:	\$66,039.32
This is Applicant's:	Third Monthly Fee Statement

Pursuant to the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee's Professionals*, dated December 2, 2019 [Dkt. No. 553] (the "Fee Assumption Order"), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals*, dated November 21, 2019 [Dkt. No. 529] (the "Interim Compensation Order"), Otterbourg P.C. (the "Applicant"), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants in the above-captioned case, hereby submits this Third Monthly Fee Statement (the "Fee Statement") for the period of December 1, 2019 through and including December 31, 2019 (the "Statement Period").

Itemization of Services Rendered and Disbursements Incurred

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Statement Period with respect to each of the project categories. As reflected in Exhibit A, Applicant incurred \$82,248.00 in fees during the Statement Period. Pursuant to this Fee Statement, Applicant seeks reimbursement for 80% of such fees, totaling \$65,798.40.

2. Annexed hereto as **Exhibit B** is a chart of Applicant's professionals and paraprofessionals, including the standard hourly rate for each attorney and paraprofessional who rendered services to the Debtors in connection with these chapter 11 cases during the Statement Period and the title, hourly rate, aggregate hours worked and the amount of fees earned by each professional. The blended hourly billing rate of attorneys for all services provided during the Statement Period is \$1,061.12². The Blended hourly rate of all paraprofessionals is \$305.00³. A copy of the computer-generated time entries reflecting the time recorded, organized in project billing categories by Applicant is attached hereto as **Exhibit C**.

3. Annexed hereto as **Exhibit D** is a chart of necessary and out-of-pocket expenses incurred by the Applicant in the amount of \$240.92 in connection with providing professional services during the Statement Period. A copy of the computer-generated list of expenses is attached hereto as **Exhibit E**.

4. Applicant, to the best of its knowledge, has not included any fees in connection with or relating to the allocation of value among the Debtors' creditors (the "Allocation Fees"). Pursuant to the Fee Assumption Order, Applicant may request Allocation Fees through a separate application at a later date.

Notice

5. Applicant will provide notice of this Fee Statement in accordance with the Interim Compensation Order.

WHEREFORE, Applicant, in connection with services rendered as co-counsel to the ad hoc committee of governmental and other contingent litigation claimants, respectfully requests

² The blended hourly billing rate of \$1,061.12 is derived by dividing the total fees for attorneys of \$80,327.00 by the total hours of 75.7.

³ The Blended hourly billing rate of \$305.00 for paraprofessionals is similarly derived by dividing the total fees for paraprofessionals of \$1921.50 by the total hours of 6.3.

(i) compensation in the amount of \$66,039.32 which is equal to 80% of the total amount of reasonable compensation for actual, necessary legal services that Applicant incurred in connection with such services during the Statement Period (*i.e.*, \$82,248.00) and (ii) payment of \$240.92 for the actual, necessary expenses that Applicant incurred in connection with such services during the Statement Period.

Dated: February 5, 2020

New York, New York

OTTERBOURG P.C.

By: /s/ Melanie L. Cyganowski
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*Co-Counsel to the Ad Hoc Committee of
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Litigation Claimants*

EXHIBIT A

Fees By Project Category

**SUMMARY OF COMPENSATION BY PROJECT CODE
FOR THE STATEMENT PERIOD**

Project Code	Project Category	Total Hours	Total Fees
PU01	Asset Analysis and Recovery	6.5	\$7,292.00
PU03	Business Operations	6.6	\$7,842.00
PU04	Case Administration	4.1	\$3,722.50
PU05	Claims Analysis	2.6	\$1,870.00
PU06	Employment and Fee Applications	7.3	\$3,371.00
PU07	Emergency Financing	24.8	\$27,915.50
PU08	Litigation: Contested Matters, Adversary	6.7	\$5,695.00
PU09	Meetings and Communications w/ AHC	22.9	\$24,115.00
PU10	Non-Working Travel (billed at 50%)	.5	\$425.00
	TOTALS:	82.0	\$82,248.00

EXHIBIT B

Professional and Paraprofessional Fees

**SUMMARY OF HOURS BILLED BY PROFESSIONALS AND PARAPROFESSIONALS
FOR THE STATEMENT PERIOD**

Professional	Year Admitted	Rate Per Hour	No. of Hrs.	Total Compensation
Melanie L. Cyganowski ("MLC") Partner	1982	\$1315.00	35.1	\$46,156.50
Jennifer S. Feeney ("JSF") Of Counsel	1998	\$850.00	39.8	\$33,830.00
Michael R. Maizel ("MRM") Associate	2017	\$425.00	.8	\$340.00
Jessica K. Hildebrandt ("JKH") Paralegal	N/A	\$305.00	6.3	\$1,921.50
	TOTAL		82.0	\$82,248.00

EXHIBIT C

Time Detail

OTTERBOURG P.C.
230 PARK AVENUE
NEW YORK, NY 10169-0075

Client/Matter No.: 20186/0002
Matter Name: CHAPTER 11
Billing Partner: RL STEHL

January 15, 2020
BILL NO. 207307

For Services Rendered Through December 31, 2019:

Phase: PU01		ASSET ANALYSIS AND RECOVERY	
DATE ATTORNEY	DESCRIPTION	HOURS	AMOUNT
12/03/19 JSF	Examine Documents Preliminary Diligence from Sackler Family	.40	340.00
12/05/19 JSF	Examine Documents Preliminary Due Diligence Materials from Sacklers	.40	340.00
12/05/19 JSF	Examine Documents Update from FTI re: Due Diligence Areas of Focus for AHC	.20	170.00
12/10/19 MLC	Review/analyze Review of draft protective order	1.30	1,709.50
12/11/19 JSF	Examine Documents Revised Protective Order from Debtors	.30	255.00
12/11/19 JSF	Examine Documents Review of Preliminary FTI Reports for AHC	.60	510.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/11/19 MLC	Review/analyze Review of draft protective order as revised by debtors	1.10	1,446.50
12/13/19 MLC	Conference call(s) Conference call re protective order issues	.60	789.00
12/19/19 JSF	Telephone Call(s) Call with Counsel for Debtors, Sacklers, UCC, Certain States re: Protective Order	.50	425.00
12/19/19 JSF	Examine Documents Review Protective Order	.30	255.00
12/19/19 MLC	Analysis of Memorandum Analysis of proposed changes to draft protective order	.80	1,052.00
TOTAL PHASE PU01		6.50	\$7,292.00

Phase: PU03

BUSINESS OPERATIONS

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/02/19 JSF	Examine Documents Update re: Wages Motion	.30	255.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/04/19 MLC	Conference call(s) Court call on hearing re: issue of wages and bonuses	3.30	4,339.50
12/19/19 JSF	Telephone Call(s) Listen Via Conference Call to Court Hearing	1.50	1,275.00
12/19/19 MLC	Attendance at Hearing Attended court hearing by court call	1.50	1,972.50
TOTAL PHASE PU03		6.60	\$7,842.00

Phase: PU04

CASE ADMINISTRATION

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/03/19 JKH	Review/analyze Review calendar deadlines	.50	152.50
12/05/19 JKH	Correspondence Review of email communications re: fee statements	.20	61.00
12/13/19 JKH	Diary & Docket Review of scheduling order and calendaring omnibus hearings	.20	61.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/20/19 JKH	Diary & Docket review of emails and calendar meetings/call dates	.20	61.00
12/23/19 JSF	Telephone Call(s) Call with AHC and Debtors' Professionals - Catch Up Call	1.20	1,020.00
12/23/19 MLC	Conference call(s) Conference call with AHC professionals in connection with various open items including ERF	1.10	1,446.50
12/23/19 MLC	Telephone Call(s) Telcon with Rachael Ringer re status of various scheduling of meetings and related issues	.70	920.50
TOTAL PHASE PU04		4.10	\$3,722.50

Phase: PU05

CLAIMS ANALYSIS

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/02/19 JSF	Examine Documents Update re: Bar Date Motion	.30	255.00
12/02/19 JSF	Examine Documents Bar Date Motion Materials from Debtor	.40	340.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/13/19 MRM	Telephone Call(s) Participate in conf. call with state committee counsel re: bar date	.80	340.00
12/20/19 JSF	Examine Documents Bar Date Materials	.40	340.00
12/31/19 JSF	Examine Documents Bar Date and POC Forms	.30	255.00
12/31/19 JSF	Telephone Call(s) Call with Debtors and Reps of Other Committees re: Bar Date Motion	.40	340.00
TOTAL PHASE PU05		2.60	\$1,870.00

Phase: PU06

EMPLOYMENT & FEE APPLICATIONS

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/02/19 JSF	Examine Documents Purdue Monthly Time Detail	.40	340.00
12/02/19 JKH	Prepare Legal Papers Prepare first monthly statement	1.50	457.50
12/03/19 JSF	Examine Documents Review Draft Monthly Statement	.50	425.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/03/19 JKH	Fee/Employment Applications Preparing first monthly fee statement	1.80	549.00
12/03/19 JKH	Prepare Chart(s) Preparing exhibit charts for first monthly statement	1.60	488.00
12/09/19 JSF	Prepare Legal Papers Finalize and File First Monthly Fee Statement	.60	510.00
12/27/19 JKH	Prepare Legal Papers Prepare draft second monthly statement	.30	91.50
12/28/19 JSF	Prepare Legal Papers Second Monthly Fee Statement	.60	510.00
TOTAL PHASE PU06		7.30	\$3,371.00

Phase: PU07

EMERGENCY FINANCING

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/01/19 MLC	Correspondence Correspondence with AHC counsel and members re ERF and next steps	.60	789.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/03/19 JSF	Examine Documents ERF Proposals and Comments From Certain States	1.40	1,190.00
12/03/19 JSF	Telephone Call(s) Conference Call with AHC Subcommittee re: ERF	.90	765.00
12/03/19 JSF	Telephone Call(s) Conference Call with AHC Members and Non-Consenting States re: ERF Proposal	.80	680.00
12/03/19 MLC	Conference call(s) Conference call with consenting states subcommittee on ERF	.90	1,183.50
12/03/19 MLC	Conference call(s) Conference call with non-consenting states subcommittee on ERF	.80	1,052.00
12/03/19 MLC	Review/analyze Review and analysis of ERF proposals	2.10	2,761.50
12/03/19 MLC	Correspondence Correspondence with consenting states subcommittee re: ERF and next steps	.70	920.50
12/04/19 MLC	Correspondence Review of correspondence from non-consenting states concerning statement of continuing harm	1.40	1,841.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/05/19 JSF	Examine Documents Draft of Non-Supporting States' Public Health Statement Filing	.40	340.00
12/09/19 MLC	Correspondence Correspondence re: ERF	.60	789.00
12/10/19 JSF	Telephone Call(s) Conference Call with Working Group of States (Consenting and Non-Consenting) re: ERF Proposal	.70	595.00
12/10/19 JSF	Examine Documents Proposal from State for Emergency Relief Fund	.40	340.00
12/10/19 MLC	Conference call(s) Telcon with states (consenting and non-consenting)re: ERF	1.10	1,446.50
12/11/19 MLC	Conference(s) in Office Meeting with consenting states re: ERF and related issues	1.80	2,367.00
12/12/19 JSF	Conference out of Office Meeting with Ad Hoc Committee and Non-Consenting States re: ERF	.50	425.00
12/12/19 JSF	Examine Documents Proposed ERF and Proposed Modifications	.60	510.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/12/19 MLC	Conference out of Office Meeting with states (consenting and non-consenting) re: ERF	2.00	2,630.00
12/15/19 MLC	Conference call(s) Conference call with consenting states' representatives re ERF proposal	1.10	1,446.50
12/18/19 JSF	Examine Documents Recent Drafts of ERF Proposal	1.40	1,190.00
12/18/19 JSF	Telephone Call(s) Call with Certain Municipalities and States and Trib re: ERF Proposal	.60	510.00
12/18/19 MLC	Conference call(s) Conference call with consenting states' reps re ERF proposal	1.00	1,315.00
12/19/19 JSF	Telephone Call(s) Call with Anne Infinger (Georgia) re: ERF Proposal	.30	255.00
12/19/19 JSF	Examine Documents Correspondence re: Status of ERF Proposal	.30	255.00
12/19/19 JSF	Examine Documents Review of ERF Proposal	.50	425.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/20/19 MLC	Conference call(s) Conference call with consenting states' reps re ERF proposal	.60	789.00
12/23/19 JSF	Examine Documents Review Correspondence re: Update on Status of ERF	.60	510.00
12/23/19 JSF	Examine Documents ERF Proposal - Current Draft	.70	595.00
TOTAL PHASE PU07		24.80	\$27,915.50

Phase: PU08

LITIGATION: CONTESTED MATTERS, ADVERSARY

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/06/19 JSF	Conference out of Office Meeting with Sacklers Counsel to Review Presentations and Overview of Litigation Positions	6.70	5,695.00
TOTAL PHASE PU08		6.70	\$5,695.00

Phase: PU09

MEETINGS & COMMUNICATIONS W/ AD HOC

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/03/19 JSF	Examine Documents Update to AHC re: Bar Date, Monitor and Investigation Updates	.50	425.00
12/05/19 JSF	Telephone Call(s) Weekly Conference Call with AHC	1.10	935.00
12/09/19 JSF	Examine Documents Agenda for AHC Meeting	.20	170.00
12/09/19 JSF	Telephone Call(s) Rachael Ringer re: Upcoming Meetings	.20	170.00
12/09/19 MLC	Conference call(s) Telcon with R. Ringer re: recent meetings and follow-up	.50	657.50
12/10/19 JSF	Telephone Call(s) Conference Call with Professionals to Prepare for AHC Meeting	1.50	1,275.00
12/11/19 JSF	Conference(s) in Office Pre-Meeting with States re: Preview of Agenda for Full AHC Meeting and ERF	1.60	1,360.00
12/12/19 JSF	Conference out of Office Meeting with Ad Hoc Committee	6.20	5,270.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/12/19 MLC	Conference out of Office Meeting with AHC members at Kramer Levin re: protective order and ERF	5.50	7,232.50
12/13/19 MLC	Conference Out of Office Meeting with States at Pillsbury, including consenting and non-consenting	3.50	4,602.50
12/17/19 MLC	Conference call(s) Conference call with AHC counsel to prepare for follow-up meetings with AHC re ERF and related issues	.50	657.50
12/18/19 JSF	Telephone Call(s) Weekly Call with AHC	1.30	1,105.00
12/20/19 JSF	Examine Documents AHC Updates	.30	255.00
TOTAL PHASE PU09		22.90	\$24,115.00

Phase: PU10

NON-WORKING TRAVEL

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/06/19 JSF	Conference out of Office Non-Working Travel to and From Milbank (Billed at Half)	.50	425.00

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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
	TOTAL PHASE PU10		.50	\$425.00
			TOTAL FOR SERVICES	\$82,248.00

EXHIBIT D

Summary of Actual and Necessary Expenses

**SUMMARY OF ACTUAL AND NECESSARY DISBURSEMENTS FOR THE
STATEMENT PERIOD**

Expense Category	Total Expenses
Air Freight	\$15.41
Conference Call(s)	\$109.57
Food Service – Conference	\$65.69
Laser Copies (\$.10 per page)	\$14.50
Taxis	\$10.25
Transportation	\$25.50
TOTAL:	\$240.92

EXHIBIT E

Expense Detail

OTTERBOURG P.C.
230 PARK AVENUE
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DISBURSEMENTS FOR YOUR ACCOUNT

Laser Copies	14.50
Conference Call(s)	109.57
Air Freight	15.41
Transportation	25.50
Taxis	10.25
Food Service - Conference	65.69

TOTAL DISBURSEMENTS	240.92
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